

**Before the
Federal Communications Commission
Washington, D. C. 20554**

In the Matter of:

Modernizing the E-rate Program for Schools and Libraries

WC Docket No. 13-184

**COMMENTS OF
Educations Innovations, LLP
Sharon Dowdy, Consultant
August 5, 2019**

I respectfully submit my comments in response to the NPRM released on July 9, 2019. I am a single consultant and project manager serving approximately 12 applicants. The District I represent range from small rural districts with an enrollment as small as 300 students to a average urban district with an enrollment of 12,000 students. I also represent library systems that support some of these districts.

I represent the type of applicant that benefits from Category 2 funding the most. For example, the smallest district with an approximate enrollment of 300 receives just over \$2,000,000 in funds per student from the State of Arkansas. These small districts have no other funds to support their infrastructure needs without E-rate funding. The challenges for these districts are so great, and without E-rate funds to supplement minimal technology budgets, these rural students will continue to lag behind other students throughout the country.

I would like to provide the following comments:

1. I am in full support of the Commission's decision to carry forward the C2 program. All of my districts and libraries have taken advantage of the C2 program. The small districts have so little funds that they don't start their projects unless they do receive funding.
2. I am in support of a full reset of the 5-year budget. The C2 budget as it is currently designed adds an unnecessary complication to the application process and continuing with the rolling budget will propagate that complication both for applicants and USAC. EPC is not designed to effectively handle the rolling budget again leading to difficulties for applicants. I believe this budget resets needs to happen immediately and not with a transition year.

Another benefit I see for the 5-year budget reset is to allow applicants with large funding projects to be able to complete them within a two-year span. An example is when a network upgrade will

cost \$100,000 but the applicant only has a \$50,000 C2 budget. The applicant could start the project in Year 5 and complete it the following year (Year 1) allowing them to utilize the full C2 budgets back to back. A rolling budget would not allow applicants this option as they would have to wait the full cycle to get the budget reset.

3. I think the budget should be reset for everyone, regardless of whether used fully or not. Having different sets of rules for applicants based on whether they did or didn't apply during the pilot period adds unnecessary complexity to the program.

4. I recommend raising the per pupil rate to a minimum of \$250 and the floor to a minimum of \$25,000. It's difficult for small districts to tackle the complexity of E-rate for a small amount of funding which would not fully upgrade their networks. Also, if the rate were increased to adequately fund system upgrades the scenario above where applicants would need to apply back to back to fully fund the upgrade would not be common.

5. I fully support a district wide budget. This will lessen the complexity of E-rate for all stakeholders and will allow districts and libraries to prioritize funding based on their individual student and patron needs vs having to fit the E-rate box. This will also allow for the simplification of equipment transfers. A district wide budget will allow funding for each student, no matter which school currently houses him or her.

Another reason it makes sense to go with a district wide budget is to simplify the application process for applicants. When applicants are required to select recipients of service and do the math on how to allocate the budgets the process becomes time consuming and can lead to errors. Additionally, you have some schools within a district that less, or older, technology, than others. This creates an equity issue for students. For example, a district may have to use more of the operating budget for enough infrastructure, thereby, reducing funds available for other student resources.

6. I support the presumption that student counts verified in one of the last four funding years are still accurate for the purpose of Category 2 budgets, absent an effort by the applicant to increase student count.

7. I support the change in rounding the inflation factor to two decimal places.

8. I recommend that rather than filing a Form 500 to return unused C2 funds to the district budget, that funds are not removed from the C2 budgets until they are paid out by USAC. This process makes logical sense and C2 budgets will accurately reflect expenditures by the applicants and USAC.

9. I agree with the difficulty of not knowing what the inflation factor is at time of application and support the implementation of a one-time inflation factor IF the per student budget is increased. If the budget is not increased, then those few dollars make a difference (i.e. they can pay for a switch or a few WAPs) and should be continued with a fixed inflation factor such as \$10 per student so that applicants can accurately plan expenditures.

10. I support the continued eligibility of Internal Connections, MIBS, and BM and recommend that they are all considered as part of internal connections rather than differentiating them as three different services. Currently, when requesting funding for equipment with separate licenses, sometimes these licenses are considered IC and other times they are BM. If the applicant chooses a piece of equipment with a necessary license that is considered BM but did not apply for BM on the Form 470, then the funding cannot be requested on the Form 471. If the applicant knew to request BM (in order to cover all the bases regarding equipment that may need licenses), then the BM can be listed on the Form 471 as a separate FRN. This adds to the burden of completing the Form 471, issuing purchase orders, invoicing, meeting document retention requirements, all for a \$75 license that is required to operate a wireless access point.

11. I support internet access on school buses, including C2 equipment and services necessary for deployment of this access. This would be like the rules regarding mobile bookmobiles. Some students in rural districts ride the bus for hours a day in addition to having long bus trips for athletics, band, debate and other educational activities. Additionally, there are many rural areas throughout the country where students don't have access to internet at home because family income simply won't support the additional cost. Districts would be able to park buses at a location that would allow students to use District provided devices to log-in to the hot spots on the buses.

Thank you for the opportunity to provide comments. I sincerely hope you choose to continue to support the E-Rate C2 program supporting connectivity for students and library patrons.

Best regards,



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